

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN
MADISON DIVISION**

KRISTOPHER C. ROSCHE,

Plaintiff,

v.

Case No. 3:20-cv-00178-slc

TRUEACCORD CORP.,

Defendant.

AFFIDAVIT IN SUPPORT OF MOTION FOR ATTORNEY'S FEES

BEFORE ME, the undersigned authority, on this day personally appeared JOSEPH S. DAVIDSON, who, being by me duly sworn, stated as follows:

1. My name is Joseph S. Davidson. I am more than 21 years old, and I have never been convicted of a felony or of any crime involving moral turpitude. I am fully competent to make this Affidavit under oath, and all of the facts set forth in this Affidavit are based on my personal knowledge and are true and correct.

2. I am an attorney with the law firm Sulaiman Law Group, Ltd., which represents the Plaintiff in the above-styled action. I have personally represented the Plaintiff in this case.

3. I have been admitted to the practice of law since 2010.

4. I am a member of good standing of the following Courts:

- State of Illinois
- United States District Court for the District of Colorado
- United States District Court for the Central District of Illinois
- United States District Court for the Northern District of Illinois
- United States District Court for the Southern District of Illinois
- United States District Court for the Northern District of Indiana
- United States District Court for the Southern District of Indiana
- United States District Court for the Eastern District of Michigan
- United States District Court for the Western District of Michigan
- United States District Court for the Eastern District of Missouri

- United States District Court for the Northern District of Ohio
- United States District Court for the Eastern District of Texas
- United States District Court for the Northern District of Texas
- United States District Court for the Southern District of Texas
- United States District Court for the Western District of Texas
- United States District Court for the Eastern District of Wisconsin
- United States District Court for the Western District of Wisconsin
- United States Court of Appeals for the 7th Circuit

5. I have substantial experience representing consumers in claims brought pursuant to the Fair Credit Reporting Act (“FCRA”), Fair Debt Collection Practices Act (“FDCPA”), Real Estate Settlement Procedures Act (“RESPA”), Telephone Consumer Protection Act (“TCPA”), Truth in Lending Act (“TILA”), and the Bankruptcy Code.

6. I have represented over 1,000 consumers in cases filed nationwide.

7. My hourly billing rate of \$425.00 is justified by my experience, the nature and complexity of the cases I handle, and the relative risk involved in consumer cases.

8. My hourly billing rate is consistent with that charged by Illinois attorneys practicing consumer law, as reported in the *United States Consumer Law Attorney Fee Survey Report 2017-2018*, *ps.* 84-87, said Report being available online at <https://burdgelaw.com/wp-content/uploads/2019/10/US-Consumer-Law-Attorney-Fee-Survey-Report-2017-2018.pdf>

9. My hourly billing rate is further supported by the fact that I have prevailed in obtaining settlement or judgment on behalf of my clients in over 95% of cases filed.

10. Attached as Exhibit 1 to Plaintiff’s Motion for Attorney’s Fees is my time and task itemization.

11. These records were made at or near the time of the event.

12. These records were made by or from information transmitted by a person with knowledge. I personally, inputted each record.

13. These records were kept in the ordinary course of a regularly conducted business activity.

14. It is a regular practice of Sulaiman Law Group, Ltd.'s business to make such a record.

15. The services performed and the amount (\$7,621.25) sought are reasonable and necessary to properly represent my client.

16. The costs incurred and the amount (\$485.00) sought are reasonable and necessary to properly represent by client.

FURTHER AFFIANT SAYETH NOT.


JOSEPH S. DAVIDSON

SUBSCRIBED AND SWORN to
before me this 4th day of May, 2020


NOTARY PUBLIC

